

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing
During Summer 2020 Demonstrations

[PROPOSED] ORDER
20 Civ. 8924 (CM) (GWG)

This document is related to:

All Cases

GABRIEL W. GORENSTEIN, United States Magistrate Judge

WHEREAS, on April 25, 2022, the parties met and conferred in good faith, and came to agreement the following issues; and

WHEREAS, Plaintiffs submitted this order pursuant to the procedures the Court ordered as a sanction in Dkt. No. 490;

NOW, THEREFORE, IT IS HEREBY ORDERED that:

1. On or before Thursday, April 28, 2022, Defendants shall respond to Plaintiffs' sanctions proposal, requesting Bates identification of the documents produced in response to Document Requests 2, 3, 4, 7, 12, 17, 20, 31, 32, 33, 35, 39-41, 49, 52, 54, 56, 57, 70, 71, 72, 73, 75, 76, 78, 88-90.
2. To the extent that Defendants reject any of Plaintiffs' proposed requests, in that same response, Defendants shall clearly explain why they do not believe that identifying what documents are responsive to the request is particularly "within the purview of the defendants" because of, among other things, "defendants' knowledge and expertise and presumed knowledge of their own documents." 2022-04-25 Tr. 74:23-75:12.
3. Defendants shall make their best efforts to provide and commit to a date certain by which they shall complete their substantive response to this sanction.

Dated: New York, New York
_____, 2022

Hon. Gabriel W. Gorenstein
United States Magistrate Judge